

Ms. Marlene H. Dortch  
 Secretary  
 Federal Communications Commission  
 445 12th Street, S.W.  
 Room TW-A325  
 Washington, D.C. 20554

February 20, 2016

**Re: Corrections in Section 310(b) Petition for Declaratory Ruling, File No. ISP-PDR-20160209-00002.**

Dear Ms. Dortch:

On February 9, 2016, Channel 51 License Co LLC filed a Petition for Declaratory Ruling to exceed the foreign ownership limits in Section 310(b) of the Communications Act, File No. ISP-PDR-20160209-00002. The Petition requested approval for indirect foreign ownership exceeding 25% in Channel 51 License Co LLC, an applicant in Auction 1002. It has come to our attention that the petition contained minor numerical errors. None of the errors are material, nor do they alter the aggregate amount of foreign ownership for which the petition seeks approval. But in the interest of complete accuracy, we enclose a corrected version of the Petition.

The changes are summarized in the following table:

PAGE(S)	ORIGINAL	CORRECTED
11, 15	<u>Interests Held</u> : ... 47% current equity	<u>Interests Held</u> : ... 45% current equity
13, 16	<u>Interests Held</u> : ... 45% current equity	<u>Interests Held</u> : ... 46% current equity
B-3	FFIC5 also has a majority indirect investment	FFIC5 also has an indirect investment
B-3	FFIC5 holds 44% of Channel51's non-voting equity	FFIC5 holds 45% of Channel51's non-voting equity
B-5	FFIC5 also indirectly holds 1% of Class B equity as a majority stakeholder	FFIC5 also indirectly holds 1% of Class B equity as a stakeholder
B-6	Future Fund Guardians indirectly holds FFIC5's share and a now-negligible amount of equity from its Class A interest, giving it also 45% indirect equity.	Future Fund Guardians indirectly holds FFIC5's share and another 1% of equity from its Class A interest, giving it 46% indirect equity.
C-3, C-4	99% [investment in an entity directly invested in Channel 51]	20% [99% investment in an entity that owns 20% of an entity directly invested in

		Channel 51]
C-3	1% [Channel 51 equity attributable to entity with 99% foreign ownership, but incorrectly positioned as a direct investor to Channel 51]	3% [same aggregate Channel 51 equity that is foreign owned, but the directly investing entity only has 20% foreign ownership]
C-4	<1% [Channel 51 equity attributable to entity with 99% foreign ownership, but incorrectly positioned as a direct investor to Channel 51]	2% [same aggregate Channel 51 equity that is foreign owned, but the directly investing entity only has 20% foreign ownership]

Kindly contact me with any questions regarding this submission.

Respectfully submitted,

*/s/ Alexander Maltas*

Alexander Maltas  
Partner, Hogan Lovells US LLP  
alexander.maltas@hoganlovells.com  
202-637-5651